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RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

NOTICE OF ERRATA

NOTICE OF ERRATA

On April 23, 2025, Plaintiffs discovered that they erroneously cited to Pritt Exhibit 40 rather than Pritt Exhibit 156 on page 37 of Plaintiffs' Reply to Motion for Partial Summary Judgment and Opposition to Meta's Motion for Partial Summary Judgment ("Plaintiffs' Opposition-Reply") (Dkt. No. 517). A corrected version of Plaintiffs' Opposition-Reply is attached hereto as Attachment 1 and the correction is reflected in the table below. No other changes have been made.

| Page | April 7, 2025 Filing | April 24, 2025 Filing |
|-------------|--|---|
| 37 | Within months of that release, the pirated origins of Books3 were chronicled in an Atlantic exposé, causing Meta employees to discuss whether the public could "deduce" that Meta continued to use Books3 with Llama 2. Ex. 40; Ex. 148, Meta_Kadrey_00063472, at -475 (stating in response to The Atlantic exposé on Books3 that Meta's continued use of Books3 was not shared externally). | Within months of that release, the pirated origins of Books3 were chronicled in an Atlantic exposé, causing Meta employees to discuss whether the public could "deduce" that Meta continued to use Books3 with Llama 2. Ex. 156, Meta_Kadrey_00054905, at -905; Ex. 148, Meta_Kadrey_00063472, at -475 (stating in response to The Atlantic exposé on Books3 that Meta's continued use of Books3 was not shared externally). |

Dated: April 24, 2025

By: /s/ Maxwell V. Pritt
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